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15 Attorneys for Defendants

16 SIGNATURE HEALTHCARE SERVICES,

17 LLC and AURORA LAS ENCINAS, LLC

18 **UNITED STATES DISTRICT COURT**

19 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

20 UNITED STATES OF AMERICA and the
21 STATE OF CALIFORNIA, *ex rel.*,
22 SHELBY EIDSON,

23 Plaintiffs,

24 vs.

25 AURORA LAS ENCINAS, LLC, LINDA
26 PARKS, SIGNATURE HEALTHCARE
27 SERVICES, LLC, AND DOES 1
28 THROUGH 10, jointly and severally,

Defendants.

Case No.: 2:10-cv-1031 JAK (RZx)

Judge: Honorable Ralph Zarefsky

**STIPULATION OF THE PARTIES
REGARDING DOCUMENTS TO BE
FILED UNDER SEAL PURSUANT
TO COURT ORDER**

1 By Order dated October 29, 2012 [Dkt. # 290], (the "Order"), Judge Kronstadt
2 granted Defendants Aurora Las Encinas Hospital, LLC, and Signature Healthcare
3 Services, LLC's ("Defendants") Motion for Injunction, in part, and ordered that the
4 parties file a Stipulation relative to all patient related documents in Relator's possession
5 relative to individuals who were patients at Defendant ALEH (the "Documents").
6 Documents that are not related to Defendant ALEH patients, such as Relator's pay stubs
7 or hospital policies, are not subject to the Order. Specifically, Judge Kronstadt ordered
8 that the Stipulation identify which of the Documents Relator must deposit with the Court,
9 to be filed under seal.

10 In accordance with the Order, the parties stipulate as follows:

11 1. On or before November 28, 2012, Relator shall deposit with the Court, to be
12 filed under seal, the following documents:

13 Bates Stamped Document Nos.:

14 BS 43 - BS 44

15 BS 52 - BS 61

16 BS 64 - BS 102

17 BS 104 - BS 107

18 BS 456 - BS 561

19 BS 825

20 BS 828

21 BS 1544 - BS 2061

22
23 2. Neither Relator, nor any of her past or current attorney(s), shall retain any
24 copies of the Documents deposited with the Court, either in paper or electronic format or
25 in redacted or unredacted format.
26
27
28

3. As to the census sheets, Bates Stamp Nos. BS 1544 - BS 2053, Relator shall submit a document to the Court that assigns each patient with a unique number, and Relator shall only be entitled to retain a copy of the list of unique numbers, excluding patient names. To the extent that Plaintiff has existing knowledge of a patient's name, Plaintiff can use that name to seek to propound authorized discovery regarding that patient.

Dated: November 28, 2012

COLLEEN FLYNN

MARK KLEIMAN

DISABILITY RIGHTS LEGAL CENTER

Attorneys for Plaintiff/Relator

By: /s/Colleen Flynn

Colleen Flynn

Dated: November 28, 2012

PATRIC HOOPER

HOOPER, LUNDY & BOOKMAN, P.C.

Attorneys for Defendant

LINDA PARKS

By: /s/Patric Hooper

Patric Hooper

Dated: November 28, 2012

DEBRA A. SPICER

ALAN G. GILCHRIST

Attorneys for Defendants

AURORA LAS ENCINAS, LLC and

SIGNATURE HEALTHCARE SERVICES, LLC

By: /s/Debra A. Spicer

Debra A. Spicer

By: /s/Alan G. Gilchrist

Alan G. Gilchrist

PROOF OF SERVICE

STATE OF MICHIGAN, COUNTY OF OAKLAND

As the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Oakland, State of Michigan. My business address is 29566 Northwestern Highway, Suite 200, Southfield, Michigan, 48034.

On November 29, 2012, I served true copies of the following document(s) described as **STIPULATION OF THE PARTIES REGARDING DOCUMENTS TO BE FILED UNDER SEAL PURSUANT TO COURT ORDER** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with The Health Law Partners, P.C.'s practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on November 29, 2012, at Southfield, Michigan.

/s/Marianna M. McIntyre
Marianna M. McIntyre

SERVICE LIST
UNITED STATES OF AMERICA, *ex rel.*, SHELBY EIDSON vs.
AURORA LAS ENCINAS, LLC, *et al.*
Case No. 2:10-cv-1031 JAK (RZx)

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Via CM/ECF